

Exhibit B

SLAIN - 4/27/21

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

MANBRO ENERGY CORPORATION,
individually and on behalf of
all those similarly situated

Plaintiffs,

vs. Case No.
20 Civ. 3773 (LGS)

CHATTERJEE ADVISORS, LLC,
CHATTERJEE FUND MANAGEMENT, LP
CHATTERJEE MANAGEMENT COMPANY,
d/b/a THE CHATTERJEE GROUP, and
PURNENDU CHATTERJEE,

Defendants.

CONFIDENTIAL

VIDEOTAPED REMOTE DEPOSITION OF CHAYA SLAIN

Tuesday, April 27, 2021

Reported by: Susan S. Klinger, RMR-CRR, CSR

Job No. 193112

Page 42

SLAIN - 4/27/21

A. Yes. So I would say that generally

Q. Is it fair to say that emerging and investments are considered more risky investments in the developed world?

A. I would say that the average stor would agree with that statement.

Q. Is it fair to say that emerging and investments are often more volatile than the developed -- than developed world investments?

A. Yes. I would say that the standard deviation of public equity returns for emerging market companies are generally higher than the standard deviation of public equity returns and

Page 44

SLAIN - 4/27/21

allocation, and we did have some investments within the marketable alternatives. We would have been considered exposure to emerging markets or developing markets, however you want to call them.

Q. Those equity investments, were they primarily listed on stock exchanges in the United States or London or Europe, but they -- those were companies that were located in the developing world, but listed on stock exchanges in the -- in the developed world? Is that -- is that what I'm understanding?

A. We had exposure to both. Both securities that were traded on -- in the -- in New York or London or emerging markets, we had exposure to those types of exposures.

Q. And did you have a target allocation of what percentage of the hedge fund investments would be exposed in the emerging markets?

A.

Page 43

SLAIN - 4/27/21

developed world companies.

Q. We were talking about private equity as one of two -- one of the many portfolios that you were responsible for. In the hedge fund space that you were responsible for, was there a target allocation for what percentage of your investments in hedge -- Parkwood's investments in hedge funds would have exposure to emerging world companies?

A. The exposures that we have with them, the hedge fund and marketable alternatives asset class was taken into consideration when we were looking at the entire portfolio.

Q. Let me ask the question again because I'm not sure that that answered it.

So what I'm trying to identify is what was the target allocation for exposure to the emerging world in the hedge fund investments that Parkwood made.

MR. McDONALD: Objection.

A. Some of the hedge funds were equities or correlated to equities. And some of those investments were considered part of

Page 45

SLAIN - 4/27/21

[REDACTED]


Q. [REDACTED]

A. [REDACTED]

Q. [REDACTED]

MR. McDONALD: Objection.

A. [REDACTED]

Page 314		Page 315	
1	SLAIN - 4/27/21	1	SLAIN - 4/27/21
2	C E R T I F I C A T E	2	NAME OF CASE: Manbro v. Chatterjee
3		3	DATE OF DEPOSITION: April 27, 2021
4	I, SUSAN S. KLINGER, a certified	4	NAME OF WITNESS: Chaya Slain
5	shorthand reporter within and for the State	5	Reason Codes:
6	of Texas, do hereby certify:	6	1. To clarify the record.
7	That CHAYA SLAIN, the witness whose	7	2. To conform to the facts.
8	deposition is hereinbefore set forth, was	8	3. To correct transcription errors.
9	duly sworn by me and that such deposition	9	Page ___ Line ___ Reason _____
10	is a true record of the testimony given by	10	From _____ to _____
11	such witness.	11	Page ___ Line ___ Reason _____
12	I further certify that I am not	12	From _____ to _____
13	related to any of the parties to this	13	Page ___ Line ___ Reason _____
14	action by blood or marriage; and that I am	14	From _____ to _____
15	in no way interested in the outcome of this	15	Page ___ Line ___ Reason _____
16	matter.	16	From _____ to _____
17	IN WITNESS WHEREOF, I have hereunto	17	Page ___ Line ___ Reason _____
18	set my hand this 28th of April, 2021.	18	From _____ to _____
19		19	Page ___ Line ___ Reason _____
20		20	From _____ to _____
21	Susan S. Klinger, RMR-CRR, CSR	21	Page ___ Line ___ Reason _____
22	Texas CSR# 6531	22	From _____ to _____
23		23	Page ___ Line ___ Reason _____
24		24	From _____ to _____
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